

# **EXHIBIT “B”**

**Aaron Wider**

Page 12

1 **Wider**

2 **Boulevard titled?**

3 A. It's a trust.

4 **Q. What's the name of the trust?**

5 A. Wider Family Trust.

6 **Q. Who are the trustees of Wider**  
7 **Family Trust?**

8 A. What is your relevancy to this  
9 question?

10 **Q. That's not --**

11 A. It has everything -- what does my  
12 home --

13 **Q. Excuse me, sir.**

14 MR. ZICCARDI: Don't answer.

15 **Q. That's not for you to ask.**

16 A. It's none of your business. That's  
17 my answer.

18 MR. ZICCARDI: Hold on. Hold  
19 on.

20 **Q. Excuse me. If your counsel has**  
21 **objections to my questions, your counsel can**  
22 **raise objections.**

23 **In the absence of an objection or**  
24 **instruction from your counsel, you have to**  
25 **answer my questions; do you understand that?**

**Aaron Wider**

Page 13

1 **Wider**

2 A. Well, now I'm -- now I'm getting an  
3 adverse reaction to my medication. So that's  
4 my answer right now. I have to take ten  
5 minutes off because I'm getting very, very  
6 nervous.

7 It's the trustee of my father -- my  
8 father's estate.

9 **Q. Hold on.**

10 A. I have to get up for a second,  
11 please.

12 **Q. Well, you can do that.**

13 A. He's actually prying into the death  
14 of my father and I reject him. Just give me a  
15 couple of minutes.

16 You're actually very -- you're  
17 pissing me off right now.

18 MR. BODZIN: Okay. We're going to  
19 go off the record then.

20 THE VIDEOGRAPHER: The time is  
21 9:22 a.m.

22 We're going off the record.

23 THE VIDEOGRAPHER: The time is  
24 9:27 a.m.

25 We're back on the record.

**Aaron Wider**

Page 14

1 Wider

2 Q. Mr. Wider the question was who were  
3 the trustees of the Wider Family Trust?

4 MR. ZICCARDI: I'm going to  
5 object to that because I don't think that  
6 has any bearing on any of the tissues of this  
7 case. It's certainly not relevant. That  
8 property is not an issue in this case.  
9 So I don't see why that is in any way  
10 relevant to the allegations --

11 MR. BODZIN: Are you instructing  
12 him not to answer the question?

13 MR. ZICCARDI: -- that we're here  
14 for today.

15 MR. BODZIN: Are you instructing  
16 him not to taken the question?

17 MR. ZICCARDI: I'm asking why is  
18 that relevant.

19 MR. BODZIN: I think it's evident  
20 why it's relevant. The ownership of all  
21 of his properties is relevant and if  
22 you're going to instruct him, please  
23 instruct him and we'll get on to the next  
24 question.

25 MR. ZICCARDI: Aaron Wider is not

**Aaron Wider**

Page 15

1 Wider

2 an individual defendant in this case.

3 MR. BODZIN: Are you instructing  
4 him not to answer the question?

5 MR. ZICCARDI: He's going to answer  
6 that question.

7 MR. BODZIN: Okay. So you're  
8 instructing him not to answer the  
9 question?

10 MR. ZICCARDI: Whether I instruct  
11 him or not, I don't think he's going to  
12 answer it.

13 MR. BODZIN: If you don't instruct  
14 him, then I'm going to ask him the  
15 question again.

16 DI. MR. ZICCARDI: I'm instructing him  
17 not to answer the question.

18 MR. BODZIN: Okay.

19 **Q. Now, where are you currently**  
20 **employed?**

21 A. I'm not. I work for free. All my  
22 money goes to charity.

23 **Q. I didn't ask you where your money**  
24 **goes to.**

25 I asked you --

**Aaron Wider**

Page 16

1 **Wider**

2 A. I'm answering your question.

3 **Q. I asked where you're currently --**

4 A. That's my answer. I answered your  
5 question.

6 **Q. Sir, you have to --**

7 A. Get used to it.

8 **Q. Sir, you're going to have to wait**  
9 **until I finish my question before you answer**  
10 **because the court reporter cannot take down**  
11 **both of us talking at the same time and if**  
12 **you're not courteous to me, you should at**  
13 **least be courteous to the court reporter.**

14 **My question is where are you**  
15 **currently employed?**

16 A. I'm not. I just told I work for  
17 free.

18 **Q. Okay. You're not employed by HTFC**  
19 **Corporation?**

20 A. No, I own HTFC Corporation.  
21 Be specific.

22 **Q. Okay. And what do the initials**  
23 **HTFC mean?**

24 A. Hit That Fuckin' Clown. That's  
25 what it means. It's an acronym.

**Aaron Wider**

Page 26

1 Wider

2 **Q. Are you a hundred percent**  
3 **shareholder of GCF Development Corporation?**

4 A. No, I've got about 10,000  
5 shareholders. It's a corporation.

6 **Q. And GCF Development Corporation**  
7 **is --**

8 A. A holding company.

9 **Q. -- a holding company for what**  
10 **companies?**

11 A. A holding company, assets. I  
12 didn't say anything about companies. You did.

13 **Q. What is the business of GCF**  
14 **Development Corporation?**

15 A. I just told you. It's a holding  
16 company.

17 **Q. For what?**

18 A. For assets. None of your business  
19 and what type of assets.

20 **Q. Sir, I would --**

21 A. Your question for the record has  
22 nothing to do with --

23 MR. ZICCARDI: Don't argue.

24 THE WITNESS: I'm not arguing.

25 **Q. What types of assets does GCF**

**Aaron Wider**

Page 27

1 **Wider**

2 **Development Corporation --**

3 A. None of your business. Your  
4 question is irrelevant. That's for the  
5 record.

6 Q. You're refusing to answer the  
7 question?

8 A. Absolutely.

9 Q. Okay. Goes GCF Development  
10 Corporation have its office at the same  
11 location as HTFC Corporation?

12 A. Yes, it does.

13 Q. And that's 400 Garden City Plaza,  
14 suite 420?

15 A. Yes.

16 Q. Are you familiar with the various  
17 properties that are the subject of this  
18 lawsuit?

19 A. Yes, I am.

20 Q. And --

21 A. Well, no. There's a lot of  
22 properties outside of the State of New York  
23 that were thrown in for no reason. I'm not  
24 familiar with them.

25 Q. I'm just asking are you familiar



**Aaron Wider**

Page 28

1 **Wider**

2 **with the properties.**

3 A. Like do I know them?

4 Are they my best friend?

5 Am I associated with them?

6 Please be specific.

7 **Q. Do you know --**

8 A. No, I don't know. Be specific.

9 MR. ZICCARDI: Let him finish the  
10 question.

11 **Q. Sir, if you can't be a little more**  
12 **civil --**

13 A. I am very civil.

14 **Q. -- in how you respond to my**  
15 **questions --**

16 A. I am very civil.

17 **Q. What we can do is we can have this**  
18 **deposition in front of the judge.**

19 A. We can do that.

20 **Q. And the judge can --**

21 A. Let's do that.

22 **Q. No, no. We're not going to --**

23 A. Let's do that, this way he can rip  
24 your ass out.

25 **Q. We're not going to do that, sir,**

**Aaron Wider**

Page 29

1 **Wider**

2 **okay.**

3 A. Then don't fuckin' threaten me,  
4 asshole.

5 Q. Well, sir, I would appreciate it if  
6 you would control your language in light of  
7 the people that are present in the room and I  
8 would appreciate it if you would be a little  
9 more courteous, okay.

10 A. I'm very courteous.

11 Q. Okay. Now --

12 A. Let's go in front of a judge and  
13 shut up.

14 Q. Sir --

15 A. Shut your mouth.

16 Q. My question --

17 A. Don't threaten me.

18 Q. My question is --

19 A. My question is go in front of a  
20 judge and stop threatening me.

21 Q. I'm not threatening you, sir.

22 A. Then shut up.

23 Q. What I'm telling you is that if you  
24 can't --

25 A. I can. If you don't like my

**Aaron Wider**

Page 30

1 Wider

2 response --

3 Q. No, no, sir.

4 A. -- then note that I'm refusing to  
5 answer it.

6 Q. Sir.

7 A. Deal with it because this is how  
8 it's going to be like clock work.

9 Q. All right, sir.

10 A. And I'll tell you what uncivil and  
11 what uncourteous is.

12 Telling you to go fuck yourself is  
13 uncivil.

14 If you ask a question, I'm going to  
15 give you a response.

16 If you pry into my father's death,  
17 I'm going to give you a response.

18 If you fuck with my mental illness,  
19 I'm going to give you a response.

20 And if you threaten me to put in  
21 front of a judge, let's do it. I got all the  
22 time in the day, all the time in the day and  
23 the judge will restrain you.

24 Q. Are you done, sir?

25 A. No, I'm not. We're just beginning.

**Aaron Wider**

Page 64

1 **Wider**

2 A. Okay.

3 Q. Okay. And according to the deeds  
4 recorded in this property, on March 7, 2005  
5 you purchased the property, Aaron Wider  
6 purchased the property from a Kim McCormack  
7 for \$525,000.

8 A. Okay.

9 Q. On that same day, March 7, 2005,  
10 the property was conveyed by Aaron Wider to  
11 the McCormack trust.

12 A. Okay.

13 Q. And then on that same day, March 7,  
14 2005, the McCormack trust conveyed the  
15 property to Aaron Wider for purchase price of  
16 \$1,150,000.

17 A. Okay.

18 Q. Okay. Can you tell me what the  
19 purpose was of those transactions that I just  
20 described?

21 A. I'm a doctor of law. I'm a  
22 teacher, okay, and it's clearly indicative of  
23 what exactly transpired. Nothing illegal  
24 happened. This is the law. I don't need to  
25 dictate to you the law. This is law school

**Aaron Wider**

Page 65

1 Wider

2 101. This is trust law.

3 The property was sold. The  
4 property was purchased at a distressed price.  
5 People go out and sell it. Actually, this is  
6 the daughter of a person who went to prison.  
7 So I got the property at a bargain on order.  
8 All right. What I buy the property for, what  
9 I sell the property for is my personal  
10 business. What I collateralize the loan at,  
11 is my personal business. What somebody  
12 chooses to buy and what somebody chooses to  
13 deflect and not buy is their personal  
14 business.

15 **Q. What was the purpose --**

16 **A. None of your --**

17 **Q. For buying a property for \$525,000**  
18 **and on the same day conveying it to a trust**  
19 **and then conveying it back to you for**  
20 **\$1,150,000?**

21 **A. None of your business.**

22 **Q. No, is is my business.**

23 **A. It's none of you business. This is**  
24 **the law. Look it up.**

25 **Q. My question is what is your**

**Aaron Wider**

Page 66

1 **Wider**

2 **purpose?**

3 A. I'm answering your question, okay.  
4 I'm a doctor of law. I'm not hear to teach  
5 you. You come to my university, you pay for  
6 it. It's on a need-to-know basis. You don't  
7 need to know.

8 **Q. Sir.**

9 A. This property -- sir, this is paid  
10 off. It came in, it went out the door.

11 I'm not here to tell you my inside  
12 trade secrets so you can go out and exploit  
13 it. It's not going to happen. Tell  
14 management at GMAC it's not going to happen.  
15 I'm not here to write your quality control  
16 department for GMAC, and that's exactly what  
17 you're -- you don't know how -- I'll tell you  
18 what. I'm going to get this off my chest,  
19 okay.

20 I am being videotaped because I'm a  
21 freakin' genius and they know it. They don't  
22 know how and why I do certain things and I'm  
23 not here to explain it to them because they're  
24 not going to copy my procedures and try to  
25 inhibit their quality control procedures out

**Aaron Wider**

Page 67

1                                   Wider

2 on the general public at my expense.

3                   So the answer to your question is  
4 there is no answer. I'm not here to educate  
5 you.

6                   You want to be educated, you spend  
7 \$10 million and I'll educate you. You tell  
8 that -- you send that back to senior  
9 management because I'll tell you what. Senior  
10 management can't explain it. You can't  
11 explain it and nobody can explain it.

12                  You want to know why?

13                  Because I'm the professor. I'm the  
14 one who wrote the book. So senior management  
15 doesn't know how I do certain things.

16                  Guess what?

17                  That's why they're \$200 billion in  
18 debt and that's a matter of public record. I  
19 have \$300 million in surplus and this debt  
20 existed before the market crashed. So they  
21 want to know how to get out of the market.  
22 Now, if they want to know how to get out of  
23 the market, they can pay me \$10 million and  
24 they can settle with me for \$50 million. Now,  
25 if you don't have a checkbook here today, no

**Aaron Wider**

Page 68

1 Wider

2 matter what you ask me, this is not going to  
3 be answered. This is the law. Nothing  
4 illegal has been done. I'm not going to  
5 explain the law to you. If you have a problem  
6 with that, you can try to get a court order  
7 from a judge and he'll laugh at you. That is  
8 my response.

9 Q. Are you done with your answer?

10 A. Yes, I am.

11 Q. On March 7, 2005, did you purchase  
12 2821 Beach Avenue for \$525,000, convey it to a  
13 trust and then have the trust convey it back  
14 to you for \$1,150,000 for the purpose of  
15 inflating the value of the property to obtain  
16 a mortgage?

17 A. For the purpose of inflating?

18 I want you to prove that before you  
19 ask the question. Prove it.

20 Q. My question is did you do that?

21 A. No, I did not.

22 Q. Okay. Sir, what was the purpose  
23 for --

24 A. None of your fuckin' business.

25 MR. ZICCARDI: Objection.



Aaron Wider

Page 69

1 Wider

2 It's been asked and answered,  
3 but...

4 THE WITNESS: So if he asked the  
5 same question like a clown, I'm going to  
6 treat him like a clown. I've got all  
7 day.

8 MR. ZICCARDI: Just say "no".

9 A. Inflating?

10 You're going to have to prove that  
11 in criminal court, my friend. So don't make  
12 an allegation that you can't prove.

13 Your underwriters wrote this file.

14 How can it be inflated if your guys  
15 say yes?

16 You represent GMAC. You underwrote  
17 the file. I'm not delegated on this file.

18 There's a commitment issued by your senior  
19 underwriters signed by senior management and  
20 your people approved it, so I inflated it?

21 Q. So, sir, is it your view that you  
22 can commit a fraud and as long as GMAC  
23 purchases a mortgage where you've committed a  
24 fraud, there's not accountability; is that  
25 what you're saying?

**Aaron Wider**

Page 70

1 **Wider**

2 MR. ZICCARDI: Hold on.

3 I'm going to object to that.

4 MR. BODZIN: I'll withdraw the  
5 question.

6 MR. ZICCARDI: Yeah.

7 MR. BODZIN: I'll withdraw the  
8 question.

9 **Q. So who created the McCormack Trust?**

10 A. I don't know. I got 10,000 people  
11 that work for me.

12 **Q. Now, if you'll take a look again at**  
13 **the file, you'll see that there's an appraisal**  
14 **performed by Mr. Mirando and supposedly**  
15 **performed by Mr. Jonason on this property that**  
16 **shows an appraised value of \$1,155,000.**

17 **Could you take a look at those,**  
18 **please?**

19 A. If you decided to charge me \$550 an  
20 hour with going rates -- I'm not done. I'm  
21 going to answer his question.

22 As an attorney that decides to  
23 charge me \$550 for superior services versus  
24 the going rate of \$250, does that justify you  
25 as being fraud or my being a freakin' comic?

**Aaron Wider**

Page 71

1 Wider

2 I am the best of this business, the best of  
3 this business.

4 Your \$200 billion deficit is not  
5 from my fraud.

6 **Q. Can you take a look at those**  
7 **appraisals?**

8 A. I can't see it. There's no -- I  
9 can't see it.

10 **Q. It's right in front of you.**

11 A. I can't see it. I can't see it  
12 right now.

13 Remember, I have a mental problem.  
14 I told you about that. If there was a  
15 problem. There's a problem right now.  
16 There's a problem right now.

17 **Q. What's the problem?**

18 A. The problem is I'm having a -- I'm  
19 having hypertension, all right. And you're  
20 not a doctor, so I'm going to stop for about  
21 two minutes. Take a break.

22 **Q. That's fine.**

23 THE WIDER: I can't see, Ray.

24 MR. ZICCARDI: Do you want to go  
25 out in the hall?

**Aaron Wider**

Page 93

1 Wider

2 Remember, I have a psychiatric  
3 condition, so that would substantiate your  
4 allegation to your question.

5 **Q. Did you purchase this property to**  
6 **occupy as your primary residence?**

7 A. Does it say that?

8 **Q. I'm asking you.**

9 A. I'm responding.  
10 Does it say that?

11 If I've lived in the same house for  
12 five-and-a-half years, it's obvious that you  
13 already know. So you're either stupid or  
14 you're playing games.

15 **Q. Now, this property was purchased by**  
16 **you on June 21, 2005 for \$535,000.**

17 A. Right.

18 **Q. It was then conveyed to the -- on**  
19 **the same date to something called the Santolli**  
20 **Family Trust.**

21 A. Okay.

22 **Q. And then from the Santolli Family**  
23 **Trust to you for \$980,000?**

24 A. Okay.

25 **Q. What is the purpose of that**

**Aaron Wider**

Page 94

1 **Wider**

2 **transaction?**

3 A. Well, I have a psychiatric  
4 condition and because -- because I have a  
5 psychiatric condition I just go out there and  
6 exercise my legal rights to the law. None of  
7 your fuckin' business.

8 Q. That's the purpose of that  
9 transaction, sir.

10 A. None of your fuckin' business.

11 Q. Okay.

12 A. It's a business decision.

13 Q. And according to the HUD statement,  
14 the cash that went out in that transaction to  
15 the seller was \$955,780.

16 So that would have been paid to  
17 Mr. Petiton as the trustee of the Santolli  
18 Family Trust?

19 A. That's right. He's a trustee.

20 Q. Okay. And if you look at the name  
21 and address of the seller, it's Santolli  
22 Family Trust, 32 Shore Drive.

23 That's the same address as the  
24 property, correct?

25 A. It's the law. Don't ask me about

**Aaron Wider**

Page 95

1 Wider

2 the law. I'm not a practicing attorney.

3 Q. I'm not asking you about the law.

4 I'm just asking if that's what it

5 says.

6 A. That's the law.

7 Q. Okay.

8 A. Obviously the person selling the  
9 property needs to use the address of where  
10 they sold the property from.

11 Q. Okay. And was that trust created  
12 for your benefit?

13 A. I have no idea.

14 Q. Well, whose benefit was it created  
15 for?

16 A. How could I -- how could I create a  
17 trust on a property I don't even own.

18 Q. Sir, you paid --

19 A. Sir --

20 Q. You paid --

21 A. Sir, I'm answering your question.

22 Q. You paid --

23 A. You practice law for GMAC and you  
24 don't even know what you're asking.

25 Q. Sir, you paid \$955,780 on a

**Aaron Wider**

Page 97

1 Wider

2 Q. And you had nothing to do with the  
3 creation of the Santolli Family Trust?

4 A. I have nothing to do with the  
5 creation of any trusts.

6 Q. It's just a coincidence that  
7 Mr. Petiton happens to be the trustee of that  
8 trust?

9 A. That's right.

10 MR. ZICCARDI: I'm going to object  
11 to the foundation.

12 Q. And it would be a coincidence if he  
13 happened to be the trustee on many of the  
14 intermediary parties that are utilized in  
15 connection with the loans that are the subject  
16 of this lawsuit?

17 MR. ZICCARDI: I'm going to  
18 object to that as irrelevant.

19 Q. It's a coincidence?

20 A. Did you hear what he said?

21 Q. Is it a coincidence?

22 A. Did you hear what he said?

23 Q. No, I'm asking you the question.

24 A. Did you hear what he said?

25 MR. ZICCARDI: How is he supposed

**Aaron Wider**

Page 98

1 Wider

2 to respond what is a coincidence, what is  
3 or what is not a coincidence?

4 MR. BODZIN: Are you telling him  
5 not answer the question?

6 MR. ZICCARDI: The question is  
7 vague. It's impossible for him to  
8 answer.

9 **Q. Is it a coincidence that**  
10 **Mr. Petiton is the trustee of the trusts that**  
11 **are the intermediary parties in these**  
12 **transactions?**

13 MR. ZICCARDI: Same objection.

14 A. Isn't the law wonderful, counselor?

15 **Q. Are you going to answer the**  
16 **question, sir?**

17 A. That's my answer. My attorney  
18 answered for me.

19 **Q. Well, that's not an answer, sir?**

20 A. Yes, it is. Welcome to New York.

21 **Q Do you know a Teresa Maretti?**

22 A. No.

23 **Q. M-a-r-e-t-t-a.**

24 A. No.

25 **Q. Have you discussed this case with**



**Aaron Wider**

Page 250

1 **Wider**

2 A. Because if you --

3 **Q. Because that's the pattern that you**  
4 **usually follow.**

5 MR. ZICCARDI: Objection.

6 A. That's not the pattern.

7 MR. ZICCARDI: Let's not.

8 THE WITNESS: You want me to  
9 respond?

10 MR. ZICCARDI: No.

11 **Q. This one it says it's for zero.**

12 A. It's not the pattern. That's the  
13 law. You don't convey to yourself for any  
14 consideration.

15 People like you who aren't educated  
16 would pay taxes on something they don't have  
17 to. That's the law.

18 **Q. Okay take a look at the --**

19 A. The pattern of not paying a tax on  
20 something is smart. Stupid people --

21 **Q. Take a look at the next deed.**

22 A. I must say, the most stupidest man  
23 I ever met.

24 MR. ZICCARDI: Look at.

25 A. I'm looking at.

**Aaron Wider**

Page 251

1 Wider

2 Q. October 13, 2004 John Petition as  
3 trustee to Frank Mancuso residing at 4 Jonwell  
4 Court Dix Hills, New York?

5 A. What about it?

6 Q. Well, do you know the purpose for  
7 these transactions?

8 A. Why the fuck would I know that?

9 Q. I'm just asking you whether you  
10 know.

11 A. Why the fuck would I know that?

12 Q. I'm asking whether or not you know  
13 that.

14 A. It's got nothing to do with the  
15 transaction.

16 Don't ask stupid questions. Ask  
17 smart questions.

18 Q. So if Mr. Petition were to say that  
19 he knew the purpose of these transactions that  
20 you knew --

21 A. It doesn't make a difference.

22 Q. -- he'd be lying?

23 A. I don't give a flying fuck what  
24 he's lying about. It has no bearing.

25 Stick to the here and now, you'll

**Aaron Wider**

Page 252

1 Wider

2 get out of here quicker because I'll take  
3 months. You'll be back and forth. I'll make  
4 your life miserable. Trust me. You'll be  
5 drinking breakfast, lunch and dinner every  
6 day. Start asking some real questions.

7 **Q. All right. So this --**

8 A. You want to know what color I wipe  
9 my ass with?

10 I swear to you, my four-year-old  
11 knows more than you.

12 **Q. You know, sir, I really restrained**  
13 **myself from responding to your comments.**

14 A. Good, good.

15 **Q. And I will continue to do so.**

16 A. I'll tell you what. It's my  
17 constitutional right to tell you to go get dim  
18 and I'm going to be shelling out of my ass  
19 every two seconds you get out of line.

20 You have a problem with it?

21 **Q. You're certainly free to stay that,**  
22 **sir.**

23 A. I sure am. Start asking some real  
24 question.

25 **Q. Okay. Sir --**

**Aaron Wider**

Page 253

1 **Wider**

2 A. Stop asking me about other people's  
3 freakin' deeds and lives and how big their  
4 dicks are and so on and so forth.

5 Q. So you weren't involved in flipping  
6 the property at 207 North Rutherford Avenue?

7 A. I don't know.  
8 Was I, counselor?

9 Q. I'm asking you.

10 A. I don't know. Am I?  
11 You're the smart one.

12 Q. Sir, were you involved in flipping  
13 that property?

14 A. You tell me.

15 Q. Sir, I'm going to ask the  
16 questions. You're going to answer the  
17 questions.

18 A. I just responded with a question.

19 Q. Were you involved in flipping the  
20 property at 207 North Rutherford?

21 A. You tell me. And you provide that  
22 evidence to the court.

23 Q. It doesn't work that way, sir.

24 A. Yes, it does. That's my answer.  
25 Listen, we can go around in circles

**Aaron Wider**

Page 254

1 Wider

2 and you'll end up with the same answer. You  
3 tell me. You're that good. You're hired by  
4 GMAC.

5 Q. Sir, my question is, and I expect  
6 an answer.

7 A. I can't recall.

8 Q. Were you involved in flipping 207  
9 North Rutherford?

10 A. I can't recall.

11 I'm involved in flipping you.

12 Q. Do you know what flipping is?

13 A. No, I don't.

14 Q. You don't know what flipping is?

15 A. No, I don't.

16 Q. And you don't know about the  
17 practice of taking a property and --

18 A. No, I don't.

19 Q. You don't even know what the  
20 question is?

21 A. I don't fuckin' give a shit. It's  
22 got no relevance.

23 MR. ZICCARDI: Let him finish.

24 A. I don't give a shit. It's got no  
25 relevance to the file.

**Aaron Wider**

Page 255

1 Wider

2 MR. ZICCARDI: Aaron.

3 A. Talk about the file and move on.

4 MR. ZICCARDI: Aaron.

5 Q. The loans that HTFC originated,  
6 when they were presented for sale to GMAC,  
7 Did you feel it was HTFC's obligation to let  
8 GMAC know if you believed that the properties  
9 had been flipped?

10 A. Absolutely. You have to understand  
11 something. I have nothing to do -- I'm not  
12 done with my answer. I am not responsible and  
13 I don't give a flying fuck who buys what and  
14 how many times it's flipped. If they've gone  
15 to the auction, if it's a fire sale, a  
16 sheriff's sale, if they bought the property  
17 for a dollar, if they bought the property for  
18 \$20 million. As long as the value of the  
19 property is there and the buyer can afford it  
20 and it's done by the guidelines of the law, I  
21 don't give a flying fuck and neither should  
22 you. As long as it's done within the  
23 guidelines of the law, borrower can afford --  
24 the borrower can afford -- the borrower can  
25 afford it, the assets are there and nothing is

**Aaron Wider**

Page 256

1 Wider

2 done illegally, I don't give a shit if they  
3 sell the property 80 -- I wouldn't care if you  
4 sold the property to yourself for 20 million.

5 Who the fuck am I to question it  
6 and who are you?

7 **Q. As a delegated underwriter in**  
8 **presenting loans for re-purchase to GMAC, it**  
9 **wasn't --**

10 **A. For purchase, not re-purchase.**

11 **Q. -- for purchase to GMAC, it was of**  
12 **no importance to you how often or for what**  
13 **amounts the properties had been flipped, so**  
14 **long as there was an appraisal that supported**  
15 **the value, correct?**

16 **MR. ZICCARDI: Objection.**

17 **MR. BODZIN: Is that right?**

18 **MR. ZICCARDI: Objection. Hold on.**

19 **MR. BODZIN: Let's not have a**  
20 **speaking objection.**

21 **If you have an objection to the**  
22 **form of the question, make the objection.**

23 **MR. ZICCARDI: It miss**  
24 **characterizes the testimony.**

25 **MR. BODZIN: Then object to the**

**Aaron Wider**

Page 257

1 Wider

2 form and let him answer the question.

3 MR. ZICCARDI: I'm going to state  
4 my objection to the record.

5 MR. BODZIN: Don't make it a  
6 speaking objection because that's --

7 MR. ZICCARDI: I'll make any kind  
8 of objection I want.

9 MR. BODZIN: No, you won't.  
10 You can object to the form. That's  
11 the only objection that's permissible.

12 MR. ZICCARDI: Well, I can state  
13 the objection for the record.

14 I mean, you're miss characterizing  
15 his testimony. He didn't say that.

16 MR. BODZIN: I'm not characterizing  
17 his testimony.

18 MR. ZICCARDI: No, you are.

19 MR. BODZIN: I'm going to ask the  
20 question again and I'll ask it a  
21 different way so as to make sure that I'm  
22 not characterizing this witness's  
23 testimony.

24 THE WITNESS: Get his permission.

25 MR. BODZIN: I don't need his



Aaron Wider

Page 258

1 Wider

2 permission.

3 THE WITNESS: Yes you do.

4 Q. My question is in submitting loans  
5 originated by HTFC for purchase by GMAC, was  
6 it HTFC's policy that so long as there was an  
7 appraisal that supported the value of the  
8 property, it was not up to HTFC to report to  
9 GMAC flip activity?

10 MR. ZICCARDI: Same objection.

11 Go ahead.

12 A. My attorney just told you to get  
13 fucked and so did I.

14 MR. ZICCARDI: No.

15 A. Okay. That's for the record.

16 Q. First of all, your attorney didn't  
17 tell me that. You told me that and now you  
18 can answer the question.

19 A. Go get fucked.

20 Q. You're not answering the question?

21 A. I did answer your question.

22 Q. No, that's not an answer to the  
23 question.

24 A. That's my answer to your question.

25 Q. Okay.

**Aaron Wider**

Page 259

1 **Wider**

2 A. My attorney very nicely told you  
3 that he objects. Fuck you. And I'm telling  
4 you on behalf of my attorney, fuck you.

5 MR. ZICCARDI: Let's take a break.

6 MR. BODZIN: I think we need to  
7 take a break.

8 MR. ZICCARDI: Let's take a break.

9 THE VIDEOGRAPHER: The time is  
10 4:00 p.m.

11 We're going off the record.

12 THE VIDEOGRAPHER: The time is  
13 4:04 p.m.

14 We're back on the record.

15 Q. Who is the person currently  
16 employed by HTFC with the greatest knowledge  
17 of HTFC's underwriting practices?

18 A. Me. I write my own policies.

19 Q. And who is the person at HTFC who  
20 is most knowledgeable about the process to  
21 follow for taking loan applications from  
22 borrowers?

23 A. Well, since I'd say one one  
24 thousandth of a percent of applications are  
25 originated by us, really nobody because I only